



Kern Audubon Society

PO Box 3581

Bakersfield CA 93385

November 30, 2007

Delores Brown, Chief
Office of Environmental Compliance
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Dear Ms. Brown:

The Kern Audubon Society would like to comment on the Monterey Amendments to the State Water Project contracts. We ask that our comments be made part of the official record. Kern Audubon Society strongly opposes the proposed amendments. We are concerned that if the amendments are adopted permanently, they would have profound negative consequences for the health of California's environment.

First and foremost, we oppose the giveaway to private interests of the Kern Water Bank, which was created and developed at the cost of several millions of public dollars. The Kern Water Bank is an important public resource which should remain in public ownership.

Second, we are concerned that the amendments would enable the increased transfer of water from northern California to the south, and from agricultural use to urban areas, without sufficient public oversight and accountability.

Third, we are concerned that the amendments would end the prohibition on using surplus water from the Delta for permanent development. These surpluses will be needed to meet demand in drought years and to provide adequate water for wildlife and fish. They should not be used to promote further sprawl and development that would destroy wildlife habitat while having an uncertain future water supply.

Finally, we are particularly concerned that the amendments would eliminate the requirement that the Department of Water Resources determine the reliable safe yield of water that can be pumped from the San Francisco Bay/Sacramento-San Joaquin Delta estuary. The amendments would open the Bay Delta ecosystem to levels of pumping that are environmentally unsustainable. The Bay Delta has already been severely over-pumped in the past seven years, with the result that fish populations have declined dramatically.

We urge that the amendments not be implemented.

Sincerely,

Douglas W. Dodd, Ph.D.
Conservation Chair